

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
52 Duane Street-10th Floor, New York, NY 10007  
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton  
Executive Director  
and Attorney-in-Chief

Southern District of New York  
Jennifer L. Brown  
Attorney-in-Charge

January 26, 2022

**BY ECF**

Honorable Colleen McMahon  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: United States v. Mario Martinez Beltran,**  
**21 Cr. 473 (CM)**

Dear Judge McMahon:

I write to request that the Court temporarily modify the home-detention condition of Mr. Martinez Beltran's bail release in order to permit him to observe Candlemas with his family in the home of his daughter's grandmother, Lilia Ramos, who lives a few blocks from Mr. Martinez Beltran. Specifically, we ask that Mr. Martinez Beltran be permitted to be out of his home from 6:00 p.m. to 11:00 p.m. on Wednesday, February 2. Ms. Ramos' address has been provided to Pretrial Services.

The Court previously granted an application to allow Mr. Martinez Beltran to spend New Year's with his family at the same address.

Pretrial Services advises that it does not consent to social requests for defendants on home detention as a general policy matter. The government defers to Pretrial Services regarding this request.

Pretrial Services notes that Mr. Martinez Beltran remains in compliance with his release conditions. Therefore, and in the absence of any reason why allowing Mr. Martinez Beltran to be with his family a few blocks from his home for a few hours would pose a risk of flight or danger to the community, the Court should grant him this application.

Respectfully submitted,

/s/

Clay H. Kaminsky  
Assistant Federal Defender  
(212) 417-8749 / (646) 842-2622

cc: AUSA Danielle Kudla  
USPSO Jonathan Lettieri (by email)

